

## **REMARKS**

Claims 1–11 and 38–43 are pending.

### **Election**

The Examiner has identified the following species:

Species I: FIGS. **1B** and **1C**;

Species II: FIGS. **1D** and **4B**.

The Examiner states that “the species are independent or distinct because one requires that the first lift platform comprises pins whereas the first means is excluded from comprising pins.” Applicants note that independent claim 38 recites in part that “neither the first means for directly supporting the substrate nor the second means for directly supporting the substrate comprises *lift pins*” (emphasis added). Applicants submit that this recitation does not exclude all pins, only *lift pins*, as the term is understood to one skilled in the art. The original specification itself alludes to the distinction between lift pins and the illustrated support pins of FIGS. **1A** and **1B**. See original specification, paragraph [0026]. Applicants submit that none of FIGS. **1B**, **1C**, **1D** or **4B** illustrates a lift pin, contrary to the Examiner’s characterization.

In addition, FIGS. **1B**, **1C**, **1D**, and **4B** actually relate to *three* different embodiments. In particular, FIGS. **1B** and **1C** illustrate an embodiment with support pins 110 that are “fixed.” *Id.* at paragraph [0033]. FIG. **1D** illustrates an embodiment in which support pins 110’ are longer than support pin 110. *Id.* at paragraph [0032]. FIG. **4B** illustrates an embodiment in which support pins 410 are rotatable about axes B-B. *Id.* at paragraph [0041].

Applicants elect for prosecution **Species I**. Applicants submit that Species I is covered by Claims 1–11, 38, 41, and 43. Claims 38, 41, and 43 cover Species I for at least the reason provided above, namely that these claims only exclude lift pins, as opposed to the support pins of Species I.

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Please charge any additional fees, including any fees for additional extension of time, or credit overpayment to Deposit Account No. 11-1410.

Respectfully submitted,

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